

MICHELE BECKWITH
Acting United States Attorney
MATHEW W. PILE, WSBN 32245
Associate General Counsel
Office of Program Litigation, Office 7
Social Security Administration
LILLIAN J. LEE, NY 5449764
Special Assistant United States Attorney
6401 Security Boulevard
Baltimore, Maryland 21235
Telephone: (206) 615-2733
E-Mail: lillian.j.lee@ssa.gov
Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ROQUE MARTINEZ,)	Case No. 1:24-CV-01245-JLT-BAM
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR AN EXTENSION OF TIME
vs.)	
)	
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty-five (35) days from April 21, 2025, up to and including May 26, 2025. The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

This is the Defendant's first request for an extension. Defendant respectfully requests this extension to allow sufficient time to prepare the Commissioner's brief in light of this case's recent reassignment to Defendant's undersigned counsel due to office need. Counsel has been diligent in her work, and in the last four weeks, has completed five responsive briefs. In addition to this case, counsel has six upcoming responsive briefs in the next four weeks, including a Circuit brief.

Respectfully submitted,

Dated: April 14, 2025

By: /s/ Dolly Trompeter*
(*as authorized via e-mail on April 14, 2025)
DOLLY TROMPETER
Attorney for Plaintiff

Dated: April 14, 2025

MICHELE BECKWITH
Acting United States Attorney
MATHEW W. PILE
Associate General Counsel
Social Security Administration

By: /s/ Lillian J. Lee
LILLIAN J. LEE
Special Assistant U.S. Attorney
Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation and good cause appearing, IT IS SO ORDERED that Defendant shall have an extension, up to and including **May 26, 2025**, to respond to Plaintiff's Motion for Summary Judgment. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: April 15, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE